

# EXHIBIT C

**From:** Nickerson, Morgan T. <[Morgan.Nickerson@klgates.com](mailto:Morgan.Nickerson@klgates.com)>  
**Sent:** Sunday, October 16, 2022 3:24 PM  
**To:** Nicholas A. Rendino <[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)>  
**Cc:** Christine A. Montenegro <[CMontenegro@kasowitz.com](mailto:CMontenegro@kasowitz.com)>; Jason S. Takenouchi <[JTakenouchi@kasowitz.com](mailto:JTakenouchi@kasowitz.com)>; McDevitt, Jerry <[Jerry.McDevitt@klgates.com](mailto:Jerry.McDevitt@klgates.com)>; Kelley, Derek W. <[Derek.Kelley@klgates.com](mailto:Derek.Kelley@klgates.com)>; Finnerty, Christopher S. <[Chris.Finnerty@klgates.com](mailto:Chris.Finnerty@klgates.com)>  
**Subject:** RE: MLW v. WWE - Rule 26(f) Conference

Nick,

Thank you for the draft.

Given that the Court continued the CMC to December, we intend to edit the joint statement to reflect this change as well as other proposed edits that we have. We will send you our proposed changes in due course. As a result, we do **not** agree that the joint statement should be filed tomorrow. To be clear and to ensure there is no confusion on this point, we do not agree to the filing of the joint report until we expressly inform you that we have no further edits or comments.

Sincerely,  
Morgan

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**From:** Nicholas A. Rendino <[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)>  
**Sent:** Friday, October 14, 2022 5:35 PM  
**To:** Nickerson, Morgan T. <[Morgan.Nickerson@klgates.com](mailto:Morgan.Nickerson@klgates.com)>  
**Cc:** Christine A. Montenegro <[CMontenegro@kasowitz.com](mailto:CMontenegro@kasowitz.com)>; Jason S. Takenouchi <[JTakenouchi@kasowitz.com](mailto:JTakenouchi@kasowitz.com)>; McDevitt, Jerry <[Jerry.McDevitt@klgates.com](mailto:Jerry.McDevitt@klgates.com)>; Kelley, Derek W. <[Derek.Kelley@klgates.com](mailto:Derek.Kelley@klgates.com)>; Finnerty, Christopher S. <[Chris.Finnerty@klgates.com](mailto:Chris.Finnerty@klgates.com)>  
**Subject:** RE: MLW v. WWE - Rule 26(f) Conference

Thanks, Morgan. Our proposed edits are attached. Please let us know whether you have any further edits – if not, we will plan to file this on Monday. We recognize that the Initial CMC was pushed today, but given that the joint case management statement is drafted, we see no reason why we should wait before filing it with the Court.

Have a nice weekend.

Regards,  
Nick

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**From:** Nickerson, Morgan T. <[Morgan.Nickerson@klgates.com](mailto:Morgan.Nickerson@klgates.com)>  
**Sent:** Thursday, October 13, 2022 3:10 PM  
**To:** Nicholas A. Rendino <[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)>  
**Cc:** Christine A. Montenegro <[CMontenegro@kasowitz.com](mailto:CMontenegro@kasowitz.com)>; Jason S. Takenouchi <[JTakenouchi@kasowitz.com](mailto:JTakenouchi@kasowitz.com)>; McDevitt, Jerry <[Jerry.McDevitt@klgates.com](mailto:Jerry.McDevitt@klgates.com)>; Kelley, Derek W. <[Derek.Kelley@klgates.com](mailto:Derek.Kelley@klgates.com)>; Finnerty, Christopher S.

<[Chris.Finnerty@klgates.com](mailto:Chris.Finnerty@klgates.com)>

**Subject:** RE: MLW v. WWE - Rule 26(f) Conference

Nick,

Attached kindly find WWE's redline edits to the joint statement. Kindly let us know if you have any further edits or if we can move towards finalizing the document for filing Monday.

We are still reviewing the proposed ESI protocol, proposed protective order, and proposed protocols and will respond to each in due course.

Best regards,  
Morgan

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**From:** Nicholas A. Rendino <[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)>

**Sent:** Friday, October 07, 2022 8:07 AM

**To:** Nickerson, Morgan T. <[Morgan.Nickerson@klgates.com](mailto:Morgan.Nickerson@klgates.com)>

**Cc:** Christine A. Montenegro <[CMontenegro@kasowitz.com](mailto:CMontenegro@kasowitz.com)>; Jason S. Takenouchi <[JTakenouchi@kasowitz.com](mailto:JTakenouchi@kasowitz.com)>; McDevitt, Jerry <[Jerry.McDevitt@klgates.com](mailto:Jerry.McDevitt@klgates.com)>; Kelley, Derek W. <[Derek.Kelley@klgates.com](mailto:Derek.Kelley@klgates.com)>; Finnerty, Christopher S. <[Chris.Finnerty@klgates.com](mailto:Chris.Finnerty@klgates.com)>

**Subject:** RE: MLW v. WWE - Rule 26(f) Conference

Morgan,

Following up on our call, attached please find our proposed edits to the Joint Rule 26 (f) report. We have also attached the following for your consideration:

1. A draft Proposed ESI Protocol
2. A draft Proposed Protective Order
3. A draft Proposed Fact Deposition Protocol
4. A draft Proposed Expert Discovery Protocol

We are happy to discuss any of the above if that would be helpful.

Regards,  
Nick

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**From:** Nickerson, Morgan T. <[Morgan.Nickerson@klgates.com](mailto:Morgan.Nickerson@klgates.com)>

**Sent:** Wednesday, October 5, 2022 5:00 PM

**To:** Nicholas A. Rendino <[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)>

**Cc:** Christine A. Montenegro <[CMontenegro@kasowitz.com](mailto:CMontenegro@kasowitz.com)>; Jason S. Takenouchi <[JTakenouchi@kasowitz.com](mailto:JTakenouchi@kasowitz.com)>; McDevitt, Jerry <[Jerry.McDevitt@klgates.com](mailto:Jerry.McDevitt@klgates.com)>; Kelley, Derek W. <[Derek.Kelley@klgates.com](mailto:Derek.Kelley@klgates.com)>; Finnerty, Christopher S. <[Chris.Finnerty@klgates.com](mailto:Chris.Finnerty@klgates.com)>

**Subject:** RE: MLW v. WWE - Rule 26(f) Conference

Nick,

As discussed below, we believe it more efficient to conduct a Rule 26 conference with a working draft of the joint report guiding the discussion. To that end, we have prepared the attached for discussion on tomorrow's call. We look forward to discussing the same.

Best regards,  
Morgan

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**From:** Nicholas A. Rendino <[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)>  
**Sent:** Wednesday, September 28, 2022 1:36 PM  
**To:** Nickerson, Morgan T. <[Morgan.Nickerson@klgates.com](mailto:Morgan.Nickerson@klgates.com)>  
**Cc:** Christine A. Montenegro <[CMontenegro@kasowitz.com](mailto:CMontenegro@kasowitz.com)>; Jason S. Takenouchi <[JTakenouchi@kasowitz.com](mailto:JTakenouchi@kasowitz.com)>; McDevitt, Jerry <[Jerry.McDevitt@klgates.com](mailto:Jerry.McDevitt@klgates.com)>; Kelley, Derek W. <[Derek.Kelley@klgates.com](mailto:Derek.Kelley@klgates.com)>; Finnerty, Christopher S. <[Chris.Finnerty@klgates.com](mailto:Chris.Finnerty@klgates.com)>  
**Subject:** RE: MLW v. WWE - Rule 26(f) Conference

Morgan,

We are prepared to discuss the issues required for the joint case management statement during the 26(f) conference and will circulate a draft joint case management statement following our discussion on October 6. As you know, there are issues we need to discuss during the conference (such as a proposed discovery schedule or other planning or discovery orders), so we think it makes more sense to circulate a draft which incorporates each party's position after we have had the benefit of our discussion.

Best,  
Nick

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**From:** Nickerson, Morgan T. <[Morgan.Nickerson@klgates.com](mailto:Morgan.Nickerson@klgates.com)>  
**Sent:** Tuesday, September 27, 2022 3:21 PM  
**To:** Nicholas A. Rendino <[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)>  
**Cc:** Christine A. Montenegro <[CMontenegro@kasowitz.com](mailto:CMontenegro@kasowitz.com)>; Jason S. Takenouchi <[JTakenouchi@kasowitz.com](mailto:JTakenouchi@kasowitz.com)>; McDevitt, Jerry <[Jerry.McDevitt@klgates.com](mailto:Jerry.McDevitt@klgates.com)>; Kelley, Derek W. <[Derek.Kelley@klgates.com](mailto:Derek.Kelley@klgates.com)>; Finnerty, Christopher S. <[Chris.Finnerty@klgates.com](mailto:Chris.Finnerty@klgates.com)>  
**Subject:** RE: MLW v. WWE - Rule 26(f) Conference

Nick,

Judge Davila's standing order and Local Rule 16-9 require the parties to submit a joint case management statement. Judge Davila requires parties to file the joint statement no later than 10 days before the case management conference (i.e., October 17). Please let us know if you plan to circulate a draft ahead of the Rule 26(f) conference that we can consider and discuss at the same.

Best regards,  
Morgan

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**From:** Nicholas A. Rendino <[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)>  
**Sent:** Thursday, September 22, 2022 10:19 AM  
**To:** Finnerty, Christopher S. <[Chris.Finnerty@klgates.com](mailto:Chris.Finnerty@klgates.com)>  
**Cc:** Christine A. Montenegro <[CMontenegro@kasowitz.com](mailto:CMontenegro@kasowitz.com)>; Jason S. Takenouchi <[JTakenouchi@kasowitz.com](mailto:JTakenouchi@kasowitz.com)>; McDevitt, Jerry <[Jerry.McDevitt@klgates.com](mailto:Jerry.McDevitt@klgates.com)>; Kelley, Derek W. <[Derek.Kelley@klgates.com](mailto:Derek.Kelley@klgates.com)>; Nickerson, Morgan T.

<[Morgan.Nickerson@klgates.com](mailto:Morgan.Nickerson@klgates.com)>

**Subject:** RE: MLW v. WWE - Rule 26(f) Conference

Thanks, Chris. That works for us – I will send around an invite and dial-in.

Best,  
Nick

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**From:** Finnerty, Christopher S. <[Chris.Finnerty@klgates.com](mailto:Chris.Finnerty@klgates.com)>

**Sent:** Thursday, September 22, 2022 9:55 AM

**To:** Nicholas A. Rendino <[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)>

**Cc:** Christine A. Montenegro <[CMontenegro@kasowitz.com](mailto:CMontenegro@kasowitz.com)>; Jason S. Takenouchi <[JTakenouchi@kasowitz.com](mailto:JTakenouchi@kasowitz.com)>; McDevitt, Jerry <[Jerry.McDevitt@klgates.com](mailto:Jerry.McDevitt@klgates.com)>; Kelley, Derek W. <[Derek.Kelley@klgates.com](mailto:Derek.Kelley@klgates.com)>; Nickerson, Morgan T. <[Morgan.Nickerson@klgates.com](mailto:Morgan.Nickerson@klgates.com)>

**Subject:** RE: MLW v. WWE - Rule 26(f) Conference

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Hi Nick,

How about 2PM EST on 10/6?

Best,

Chris

**K&L GATES**

**Christopher S. Finnerty**

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**From:** Nicholas A. Rendino <[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)>

**Sent:** Wednesday, September 21, 2022 5:20 PM

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**Cc:** Christine A. Montenegro <[CMontenegro@kasowitz.com](mailto:CMontenegro@kasowitz.com)>; Jason S. Takenouchi <[JTakenouchi@kasowitz.com](mailto:JTakenouchi@kasowitz.com)>

**Subject:** MLW v. WWE - Rule 26(f) Conference

Chris,

As you know, the parties are required to hold their Rule 26(f) conference “as soon as practicable” after the case is filed, and at the latest by October 6. We are available all day on October 5 or before 4:30 p.m. ET on October 6. Please let us know if there is a time during those days that works for you.

Regards,  
Nick

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